

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS	:	
716 North Barrett Lane	:	
Christiana, DE 19702	:	DISTRICT COURT
PLAINTIFF	:	
	:	
v.	:	No. 04-251 JJF
	:	
JO ELLEN CHAPEN SHELDON	:	
708 Pebble Beach Drive	:	
Elkton, MD 21921	:	
	:	TRIAL BY JURY DEMANDED
DEFENDANT	:	

NOTICE OF MOTION

TO: Ms. Ashley Adams
P.O. Box 7652
Newark, DE 19714

PLEASE take notice that the undersigned will present
the attached Motion to Request Mediation With Magistrate Judge
Thynge at a time convenient to the court.

/s/Beth H. Christman
BETH H. CHRISTMAN, ESQ.
I.D. No. 2107
Casarino, Christman & Shalk, P.A.
800 N. King Street, Suite 200
P.O. Box 1276
Wilmington, DE 19899
(302) 594-4500
Attorney for Defendant

DATE: February 27, 2007

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

ASHLEY ADAMS	:	
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Christiana, DE 19702	:	DISTRICT COURT
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v.	:	No. 04-251 JJF
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**Motion to Request Mediation
With Magistrate Judge Thyng**

Comes now, Beth H. Christman and Casarino, Christman & Shalk, P.A., respectfully requesting this Honorable Court to assign this case for mediation with Magistrate Judge Thyng, based upon the following:

1. Plaintiff has filed suit against the Defendant as a result of an automobile accident on April 23, 2002. She was represented by Charles Cooper when suit was filed and was subsequently represented by Kevin Healy, who recently withdrew his representation of the Plaintiff. Plaintiff is now representing herself.

2. The depositions of Plaintiff and Defendant were taken on July 6, 2005, in the company of her attorney, Charles Cooper. Discovery has exchanged and medical records have been obtained since then. All of these records have been sent to Plaintiff.

3. The parties attended a settlement conference on September 20, 2006 but did not resolve the case. Since then,

Defendant has served an Offer of Judgment on Plaintiff.

4. Plaintiff has filed discovery on Defendant recently, following which Defendant filed a Motion for a Protective Order which remains pending.

5. The matter is not yet scheduled for trial. There will be a pre-trial conference in the case on October 4, 2007.

6. Defendant is requesting that the Court assign this matter to Magistrate Judge Thyng in the hopes that the matter can be resolved.

WHEREFORE, the Defendant respectfully requests that this Court assign this case for mediation with Magistrate Judge Thyng.

/s/Beth H. Christman
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DEFENDANT

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DISTRICT COURT

No. 04-251 JJF

TRIAL BY JURY DEMANDED

ORDER

Defendant's motion to request mediation with Magistrate Judge Thyng having been presented, IT IS SO ORDERED this _____ day of _____, 2007 that defendant's request is hereby GRANTED, and mediation shall take place on or before _____, 2007 or as the schedule of Magistrate Judge Thyng permits.

J.

CERTIFICATE OF SERVICE

I, BETH H. CHRISTMAN, hereby certify that I have served the original of the within document by U.S. District Court e-filing on this 27th day of February, 2007, and that true and correct copies of the attached Motion to Request Mediation With Magistrate Judge Thyng, were placed in the first class U.S. mail from 800 N. King Street, Wilmington, Delaware 19801 addressed to:

Ms. Ashley Adams
P.O. Box 7652
Newark, DE 19714

/S/Beth H. Christman
BETH H. CHRISTMAN, ESQ.
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